

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

NEW MEXICO UNITED FOOD AND
COMMERCIAL WORKERS UNION'S AND
EMPLOYERS' HEALTH AND WELFARE TRUST
FUND, on behalf of itself and all others similarly
situated,

Plaintiff,

v.

PURDUE PHARMA L.P., PURDUE PHARMA,
INC., THE PURDUE FREDERICK COMPANY,
INC. d/b/a THE PURDUE FREDERICK
COMPANY, P.F. LABORATORIES, INC.,
ABBOTT LABORATORIES, ABBOTT
LABORATORIES, INC., MICHAEL FRIEDMAN,
HOWARD R. UDELL, PAUL D. GOLDENHEIM,
JOHN DOE Nos. 1 through 20, and JANE DOE Nos.
1 through 20,

Defendants.

Civil Action No. 07-cv-6916-JGK

MOTION TO ADMIT COUNSEL
PRO HAC VICE

FILED
2007 NOV -1 AM 10:50
S.D. OF N.Y.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for
the Southern and Eastern Districts of New York, I, Christopher A. Seeger, a member in good
standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice*
of:

Jonathan Shub
Seeger Weiss LLP
1515 Market Street, Suite 1380
Philadelphia, PA 19102
Telephone: (215) 564-2300
Fax: (215) 851-8029

Jonathan Shub is a member in good standing of the Bars of the Commonwealth of
Pennsylvania and the State of California. There are no pending disciplinary proceedings against
her in any State or Federal Court. Attached hereto as Exhibit 1 is Mr. Shub's Affidavit, with


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Exhibit A, an original Certificate of Good Standing from the Pennsylvania Supreme Court attached thereto.

Dated: October 31, 2007

Respectfully Submitted.

SEEGER WEISS LLP

By: 

Christopher A. Seeger (CS-4880)
One William Street
New York, NY 10004
Telephone: (212) 584-0700
Facsimile: (212) 584-0799

Counsel for Plaintiff and the Class

**UNITED STATES DISTRICT COURT
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**AFFIDAVIT OF CHRISTOPHER
A. SEEGER IN SUPPORT OF
MOTION TO ADMIT COUNSEL
*PRO HAC VICE***

State of New York)
County of New York)ss:

Christopher A. Seeger, being duly sworn, hereby deposes and says as follows:

1. I am a member of Seeger Weiss LLP, counsel for Movant, New Mexico United Food and Commercial Workers Union's and Employers' Health and Welfare Trust Fund ("Movant"), in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Movant's motion to admit Jonathan Shub as counsel *pro hac vice* to represent Movant in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1990. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Jonathan Shub since 2000.

4. Mr. Shub is a partner with my firm.

5. I have found Mr. Shub to be a skilled attorney and a person of integrity. He is experienced in federal practice and is familiar with the Federal Rules of Civil Procedure.

6. Accordingly, I am pleased to move the admission of Jonathan Shub, *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Jonathan Shub, *pro hac vice*, which is attached hereto.

WHEREFORE, it is respectfully requested that the motion to admit Jonathan Shub, *pro hac vice*, to represent Movants in the above-captioned matter, be granted.



Christopher A. Seeger

Sworn before me this 31 day
of OCTOBER, 2007



NOTARY PUBLIC

Jose D. Mora
Notary Public State of New York
No. 03-6062383 Qualified in Bronx County
Certificate Filed in New York County
Commission Expires August 6, 2009

CERTIFICATE OF SERVICE

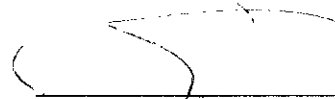
I, Christopher A. Seeger hereby certify that on October 31 2007, I caused a true and correct copy of the foregoing document, *Motion to Admit Counsel Pro Hac Vice*, to be served via U.S. mail, with proper postage prepaid, on all counsel of record at the following addresses:

Michael Colbert Hartmere, Esq.
Matthew Terrence McLaughlin, Esq.
VENABLE (NYC)
405 Lexington Ave, 62nd Floor
New York, NY 10174
T. (212)-307-5500
F. (212)-307-5598 (fax)

Counsel for defendants Abbott Laboratories, Abbott Laboratories, Inc.

Alexandra Katherine Nellos, Esq.
Donald I. Strauber, Esq.
Phoebe Anne Wilkinson, Esq.
Mary Therese Yelenick, Esq.
CHADBOURNE & PARKE LLP (NY)
30 Rockefeller Plaza
New York, NY 10112
T. (212) 408-5100
F. (646) 710-1189

Counsel for defendants P.F. Laboratories, Inc., Purdue Pharma, Inc., Purdue Pharma, L.P., The Purdue Fredrick Company, Inc., Howard R. Udell, Michael Friedman, Paul D. Goldenheim



Christopher A. Seeger

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**AFFIDAVIT OF JONATHAN
SHUB, ESQUIRE**

I, Jonathan Shub, Esquire, a partner of Seeger Weiss LLP, in the Philadelphia, Pennsylvania office, declare the following under penalty of perjury:

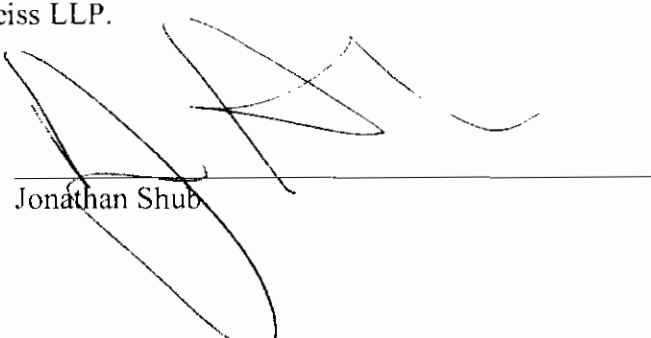
1. I am a member in good standing of the bars of the Commonwealth of Pennsylvania and State of California and am admitted to practice before the United States District Courts for the Eastern District of Pennsylvania. I have never been disciplined, suspended or disbarred by these or any other Court.

2. Attached hereto is a Certificate attesting to my admission date and that I am a member in good standing in both the bars of the Commonwealth of Pennsylvania.

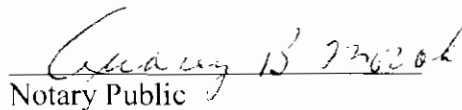
3. I have extensive experience in state and federal trial courts. I also have experience in pharmaceutical litigation, including *In re Lupron Marketing and Sales Practices Litig.*, MDL No. 1430 (D. Mass.) and *In re Pharmaceutical Industry Average Wholesale Price*

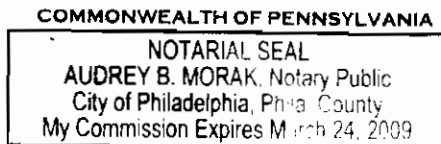
Litig., MDL No. 1456 (D. Mass), where I represented consumers and third party payors against numerous pharmaceutical companies and was admitted *pro hac vice* in the District Court of Massachusetts in connection therewith. Accordingly, New Mexico UFCW Union's and Employers' Health and Welfare Trust Fund has asked that I serve as co-counsel.

4. Based upon the foregoing, I respectfully request admission to this Court, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for Southern District and Eastern District of New York, for the purpose of appearing and arguing on behalf of plaintiff, which is represented by the firm, Seeger Weiss LLP.


Jonathan Shub

Sworn before me this 30th day
of October, 2007


Notary Public





Supreme Court of Pennsylvania

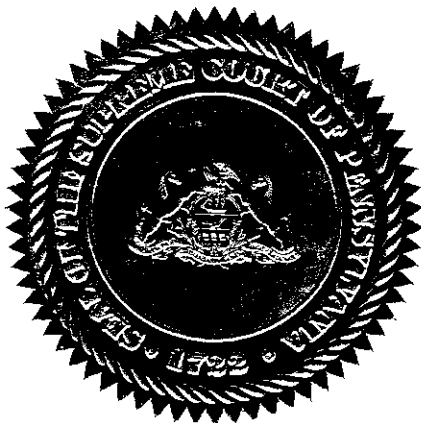
CERTIFICATE OF GOOD STANDING

Jonathan Shub, Esq.

DATE OF ADMISSION

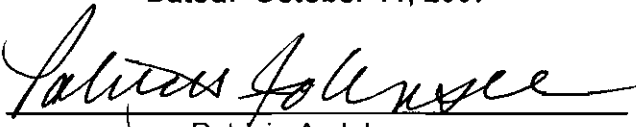
December 5, 1988

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: October 11, 2007


Patricia A. Johnson
Chief Clerk

**UNITED STATES DISTRICT COURT
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Defendants.

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**ORDER FOR ADMISSION
PRO HAC VICE ON
WRITTEN MOTION**

Upon the motion of Christopher A. Seeger, attorney for New Mexico United Food and Commercial Workers Union's and Employers' Health and Welfare Trust Fund, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that:

Jonathan Shub, Esquire
Seeger Weiss LLP
1515 Market Street, Suite 1380
Philadelphia, PA 19102
T. (215) 564-2300
F. (215) 851-8029
Email: jshub@seegerweiss.com

is admitted to practice *pro hac vice* as counsel for New Mexico United Food and Commercial Workers Union's and Employers' Health and Welfare Trust Fund in the above-captioned case in

the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: October ___, 2007

New York, New York

United States District Court Judge